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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 ROBERT CORTEZ MARSHALL,
14 Defendant.

Case No. 2:19-cr-270-JAD-BNW

**STIPULATION TO TEMPORARILY
RELEASE DEFENDANT**

15
16 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
17 Acting United States Attorney, and Assistant United States Attorney Tony Lopez, and Rene L.
18 Valladares, Federal Public Defender, and Brian Pugh, Assistant Federal Public Defender,
19 counsel for Robert Cortez Marshall, that the detention hearing regarding defendant's custody
20 be reopened and Robert Cortez Marshall be released on conditions.

21 This Stipulation is entered into for the following reasons:

22 1. On March 18, 2021, Mr. Marshall made his initial appearance on the
23 Superseding Indictment and the Court detained Mr. Marshall. ECF Nos. 70, 71, 73. At the
24 time, Mr. Marshall's significant other was expecting the birth of their first child.

25 2. On August 4, 2021, Mr. Marshall's significant other gave birth to their first
26 child.

1 3. The parties have negotiated an agreement wherein Mr. Marshall be released with
2 conditions for two weeks after his change of plea hearing and before sentencing to give him
3 time to bond with his child before serving his sentence.

4 4. The parties discussed conditions of release and believe that Mr. Marshall can be
5 released on the following conditions:

- 6 a. Home detention. Mr. Marshall will only be permitted to leave his
7 residence for medical emergencies, attorney visits, or other reasons pre-
8 approved by his pretrial services officer;
- 9 b. Location Monitoring; and
- 10 c. The release conditions imposed at Mr. Marshall's October 17, 2019
11 initial appearance. *See* ECF Nos. 7, 10.
- 12 d. Any other condition the Court deems appropriate.

13 5. The parties further request this Court reopen Mr. Marshall's detention hearing
14 in order to consider the parties' proposed conditions.

15 DATED: September 13, 2021.

16 RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

17 By /s/ Brian Pugh

By /s/ Tony Lopez

18 BRIAN PUGH
Assistant Federal Public Defender

TONY LOPEZ
Assistant United States Attorney

21 ORDER

22 IT IS SO ORDERED.

23
24
25 
26 U.S. MAGISTRATE JUDGE

DATED: September 14, 2021